

IN THE UNITED STATES COURT OF FEDERAL CLAIMS

AECOM ENERGY & CONSTRUCTION,
INC.,

Plaintiff,

v.

THE UNITED STATES OF AMERICA,
Defendant.

Case No. 20-2016 C

JOINT MOTION TO EXTEND SCHEDULING ORDER DEADLINES

Plaintiff AECOM Energy & Construction, Inc., formerly known as URS Energy & Construction, Inc., (“Plaintiff”) and Defendant the United States of America (“Defendant”) submit this Joint Motion To Extend Scheduling Order Deadlines pursuant to Court of Federal Claims Rules 6(b) and 6.1. The Parties respectfully move this Court to modify the Scheduling Order (ECF No. 15), by extending the deadline for substantial completion of discovery by five months, and by adjusting other deadlines accordingly.

This case involves complex issues that require extensive document production, written discovery, depositions, and expert witness discovery before trial. Of note, Plaintiff has served 124 Requests for Production on Defendant, and Defendant has served 138 Requests for Production on Plaintiff. Although both sides have begun document production, both sides have a significant volume of documents left to produce. The current scheduling order provides for a phased discovery period involving (1) document discovery; (2) completion of fact depositions; and (3) expert discovery. Under the current schedule, document production is to be substantially complete on May 6, 2022, but as noted, the Parties have a significant volume of documents left to produce. After discussion, the Parties believe a five-month extension of the deadline for substantial completion of document discovery will allow for substantial completion by both

parties so that no party will be prejudiced by having to complete depositions without access to relevant documents.

The Parties therefore respectfully request that the Court find good cause to modify the current deadlines identified in the Court's July 15, 2021 Scheduling Order (ECF No. 15) as follows:

Event	Current Deadline	Requested New Deadline
Substantial Completion of Document Production	5/6/2022	9/30/2022
Close of Fact Discovery	12/30/2022	5/26/2023
Exchange of Expert Reports	2/24/2023	7/21/2023
Exchange of Rebuttal Expert Reports	4/21/2023	9/15/2023
Close of Expert Discovery	6/16/2023	11/17/2023
Joint Status Report	6/30/2023	12/1/2023
Motions For Summary Judgment Due	8/15/2023	1/26/2024
Opposition Briefs Due		3/8/2024
Reply Briefs Due		3/29/2024
Trial	1/8/2024 – 1/26/2024	TBD ¹

¹ The Parties propose that they propose a trial date or set forth their respective positions on scheduling of trial in the December 1, 2023 Joint Status Report.

May 2, 2022

Respectfully submitted,

/s/ Charles C. Speth

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